

EXHIBIT 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE FLINT WATER LITIGATION

Case No. 5:16-cv-10444-JEL-MKM
Hon. Judith E. Levy

This Document Relates To:
BELLWETHER III

Case No. 5:17-cv-10164-JEL-KGA

**DECLARATION OF JAMES M. CAMPBELL IN SUPPORT OF
DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA
OPERATING SERVICES, LLC'S MOTION TO EXCLUDE EVIDENCE OF
DAVID THOMPSON'S PRIOR WORK ON CHILD SEX ABUSE CASES
AND ROBERT MCCAFFREY'S PRIOR WORK ON DEATH PENALTY
CASES**

I, James M. Campbell, declare as follows:

1. I am a partner of the law firm of Campbell Conroy & O'Neil, P.C., and I represent Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively, VNA) in the above-captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit 2 is a true and correct excerpt of the transcript of the deposition of Dr. Robert McCaffrey.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on July 22, 2024

Boston, Massachusetts

/s/ James M. Campbell
James M. Campbell